

June 1, 2015

Mr. Mathew Burke, Quality Assurance Manager
Premier Technology, Inc.
1858 West Bridge Street
Blackfoot, ID 83221

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF
PREMIER TECHNOLOGY, INC NO. 99901394/2015-201

Dear Mr. Burke,

On April 13-17, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Premier Technology, Inc. facility (hereafter referred to as PTI) in Blackfoot, ID. The purpose of this limited-scope routine inspection was to assess PTI's compliance with provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," and selected portions of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

This inspection specifically evaluated PTI's implementation of quality activities associated with the fabrication and inspection of the Integrated Head Package and Reactor Vessel Internal Lifting Rig for the Westinghouse Electric Company AP1000 reactor design. The enclosed report presents the results of the inspection. This NRC inspection report does not constitute NRC endorsement of your overall quality assurance (QA) or Part 21 programs.

Within the scope of this inspection, no violations or nonconformances were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response, (if applicable), should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

M. Burke

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If Safeguards Information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Sincerely,

/RA/

Edward H. Roach, Chief
Mechanical Vendor Inspection Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No.: 99901394

Enclosure:
Inspection Report No. 99901394/2015-201
and Attachment

M. Burke

- 2 -

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Sincerely,

/RA/

Edward H. Roach, Chief
Mechanical Vendor Inspection Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

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**U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NEW REACTORS
DIVISION OF CONSTRUCTION INSPECTION AND OPERATIONAL PROGRAMS
VENDOR INSPECTION REPORT**

Docket No.: 99901394

Report No.: 99901394/2015-201

Vendor: Premier Technology, Inc.
1858 West Bridge Street
Blackfoot, ID 83221

Vendor Contact: Mr. Mathew Burke
Quality Assurance Manager
E-mail: mburke@ptius.net
Phone: (208) 782-9122

Nuclear Industry Activity: Premier Technology, Inc. (PTI) manufactures the Integrated Head Package (IHP) and Reactor Vessel Internal Lifting Rig (RVILR) for the Westinghouse Electric Company AP1000 reactor design.

Inspection Dates: April 13 - 17, 2015

Inspectors:	Laura Micewski	NRO/DCIP/MVIB	Team Leader
	Brent Clarke	NRO/DCIP/MVIB	
	Yamir Diaz-Castillo	NRO/DCIP/MVIB	
	David Harmon	RII/DCI/CIB3	
	Thomas Kendzia	NRO/DCIP/QVIB	
	Edgardo Torres	NRO/DCIP/MVIB	

Approved by: Edward H. Roach, Chief
Mechanical Vendor Inspection Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Enclosure

EXECUTIVE SUMMARY

Premier Technology, Inc.
99901394/2015-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a vendor inspection at the Premier Technology, Inc. facility (hereafter referred to as PTI) to verify that it had implemented an adequate quality assurance (QA) program that complies with the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities." In addition, the inspectors also verified that PTI implemented a program under 10 CFR Part 21, "Reporting of Defects and Noncompliance," that met the NRC's regulatory requirements. The inspectors conducted the inspection from April 13-17, 2015. This was the initial NRC vendor inspection at the PTI facility.

Some of the specific activities observed by the inspectors included:

- Liquid penetrant test (PT) inspection of Virgil C. (VC) Summer Unit 2 Lift Leg G02-a
- Dimensional and visual test (VT) for welds on VC Summer Unit 2 Lift Leg G02-a
- Flux core arc welding of VC Summer Unit 2 Lift Leg G02-b
- Walkdown of the welding material storage area, specifically, verifying weld rod storage conditions
- Walkdown of coating application facilities, including three coating bays, coating storage room and blasting facilities
- Application activity of safety-related Carboline 890N coating to Zone PIC-II/Zone 3 3-II containment materials.
- Material testing (spectrometer, N2 analysis, and tensile strength testing) for commercial-grade dedication of ASTM A240 plate material

The following regulations served as the bases for the NRC inspection:

- Appendix B to 10 CFR Part 50
- 10 CFR Part 21

During the course of this inspection, the inspectors implemented Inspection Procedure (IP) 43002, "Routine Inspections of Nuclear Vendors"; IP 43004, "Inspection of Commercial-Grade Dedication Programs"; and IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance."

The information below summarizes the results of this inspection.

Design Control and Commercial-Grade Dedication

The inspectors concluded that PTI established a program that adequately controls design changes and commercial-grade dedication (CGD) in accordance with the regulatory requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its design control and CGD. No findings of significance were identified.

Nonconforming Materials, Parts, or Components

The inspectors concluded that PTI established a program for nonconformance control in accordance with the regulatory requirements of Criterion XV, "Nonconforming Material, Parts and Components," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its nonconformance program. No findings of significance were identified.

10 CFR Part 21 Program

The inspectors concluded that PTI established a program for reporting of defects and noncompliance in accordance with the regulatory requirements of 10 CFR Part 21. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the 10 CFR Part 21 program. No findings of significance were identified.

Manufacturing Control

The inspectors concluded that PTI established a special processes control program in accordance with the regulatory requirements of Criterion IX, "Control of Special Processes," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed and special processes observed, the inspectors also determined that PTI is implementing its policies and procedures associated with special process control. No findings of significance were identified.

Corrective Action Program

The inspectors concluded that PTI established a corrective action program (CAP) in accordance with the regulatory requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with its. No findings of significance were identified.

Oversight of Contracted Activities

The inspectors concluded that PTI established a program that adequately controls procurement of equipment and services in accordance with the regulatory requirements of Criterion IV, "Procurement Document Control," Criterion VII, "Control of Purchased Material, Equipment, and Services," and Criterion XVIII, "Audits" of Appendix B to 10 CFR Part 50. Based on the limited

sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its procurement program. No findings of significance were identified.

Inspection

The inspectors concluded that PTI established a program that adequately controls inspection in accordance with the regulatory requirements of Criterion X, "Inspection" of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its inspection program. No findings of significance were identified.

Control of Measuring and Test Equipment

The inspectors concluded that PTI established a program that adequately controls measuring and test equipment in accordance with the regulatory requirements of Criterion XII, "Control of Measuring and Test Equipment" of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its measuring and test equipment program. No findings of significance were identified.

Training and Qualification of Personnel

The inspectors concluded that PTI established a program that adequately controls training and qualification of personnel in accordance with the regulatory requirements of Criterion II, "Quality Assurance Program" of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its training and qualification program. No findings of significance were identified.

Internal Audits

The inspectors concluded that PTI established a program that adequately controls internal audits in accordance with the regulatory requirements of Criterion XVIII, "Audits" of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is effectively implementing its audit program. No findings of significance were identified.

REPORT DETAILS

1. Design Control and Commercial-Grade Dedication

a. Inspection Scope

The inspectors reviewed Premier Technology, Inc.'s (hereafter referred to as PTI) policies and implementing procedures that govern the design control program to verify their compliance with the regulatory requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. Specifically the inspectors reviewed Sections QA 3.1, "Design Control," and QA 5.1, "Preparation, Review, and Approval of Instructions, Procedures, and Drawings," of the NQA-1 Quality Assurance Manual, Revision 3, dated July 29, 2014. The inspectors reviewed Technical Procedure (TP) 2.1, "Drawing Preparation and Control," Revision 4, dated March 2, 2015, and TP 2.2, "Engineering Design," Revision 10, dated February 27, 2015.

The inspectors verified that PTI is using Westinghouse Electric Company (WEC) specifications and drawings for the work associated with the AP1000. The inspectors verified that PTI is not performing any safety-related design work, except as part of the commercial-grade dedication (CGD) process, for the AP1000, and is not performing any other safety-related design work at the current time. For the manufacturing process work travelers (which are used to build safety-related components), the inspectors reviewed Sections QA 2.2, "Preparation of Travelers" of the NQA-1 Quality Assurance Manual, Revision 3, dated July 29, 2014, and TP 2.6, "Review of Travelers," Revision 2, dated August 27, 2014. The inspectors verified that the travelers used WEC design specifications, including technical and quality requirements, and WEC drawings.

The inspectors also reviewed TP 2.14, "Commercial Grade Dedication," Revision 2, dated March 6, 2015, which provides the methodology for dedicating commercial-grade items and services for use in safety-related applications, including performing a technical evaluation to identify all safety functions, the development of critical characteristics, determination of dedication methods, and the acceptance criteria. The inspectors reviewed the commercial-grade dedication logs for the AP1000 Integrated Head Package (IHP) and Reactor Vessel Internal Lifting Rig (RVILR) and selected 22 of 155 CGD packages for a detailed review, based on importance of the item or service, uniqueness of the item or service, including material upgrades (which were the majority of PTI's CGD packages) and spanning from 2010 to 2015. For all the packages reviewed, the inspectors verified that a technical evaluation was documented, critical characteristics developed, dedication methods determined, and acceptance criteria specified. The inspectors also verified that the CGD packages reviewed were reviewed and approved by WEC, since WEC was the design authority. The inspectors verified supporting documentation, such as vendor survey reports, testing documentation, purchase orders (POs), and vendor Certificates of Conformance, documented implementation of the CGD package requirements. The inspectors reviewed the dedication of calibration services to verify how PTI developed its commercial-grade dedication plan for third-party calibration services.

The inspectors observed material testing (spectrometer, N₂ analysis, and tensile strength testing) for CGD package number 14-012, for dedication of ASTM A240 plate material.

The inspectors discussed the design control and commercial-grade dedication programs with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors determined that PTI established a program that adequately controls design changes and CGD in accordance with the regulatory requirements of Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors determined that PTI is also effectively implementing its design control and CGD processes. No findings of significance were identified.

2. Nonconforming Materials, Parts, or Components

a. Inspection Scope

The inspectors reviewed PTI policies and implementing procedures that govern the control of nonconformances to verify compliance with the requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," of Appendix B to 10 CFR Part 50.

The inspectors reviewed the PTI Nonconformance Report (NCR) Log and several NCR's related to the IHP and RVILR projects to ensure that PTI implemented an adequate program to assess and control nonconforming items, including appropriate identification, documentation, segregation, evaluation, and disposition. Additionally, the inspectors interviewed PTI personnel and inspected the shop floor to verify that there were designated areas to segregate and control nonconforming materials. Finally, the inspectors verified that the PTI nonconformance process provided a link to the 10 CFR Part 21 program.

The inspectors discussed the nonconforming materials, parts, or components program with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors concluded that PTI is implementing its control of nonconforming items program in accordance with the regulatory requirements of Criterion XV, "Nonconforming Materials, Parts, or Components," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the nonconformances program. No findings of significance were identified.

3. 10 CFR Part 21 Program

a. Inspection Scope

The inspectors reviewed the policies and implementing procedures of PTI that govern the facility's compliance with the requirements of 10 CFR Part 21, "Reporting of Defects and Noncompliance." In addition, the inspectors evaluated the 10 CFR Part 21 postings and a sample of PTI's POs for compliance with the requirements of 10 CFR 21.21, "Notification of Failure to Comply or Existence of a Defect and its Evaluation," and 10 CFR 21.31, "Procurement Documents." The inspectors also verified that PTI's nonconformance and corrective action procedures provide a link to the 10 CFR Part 21 program. Furthermore, the inspectors discussed the 10 CFR Part 21 program with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors determined that PTI is implementing its 10 CFR Part 21 program in accordance with the regulatory requirements of 10 CFR Part 21. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the 10 CFR Part 21 program. No findings of significance were identified.

4. Manufacturing Control

a. Inspection Scope

The inspectors reviewed PTI's policies and implementing procedures that govern the control of special processes to verify compliance with the regulatory requirements of Criterion IX, "Control of Special Processes," of Appendix B to 10 CFR Part 50.

The inspectors reviewed a sample of travelers, welding procedures and qualification records, welder qualification records, and weld filler metal certified material test reports (CMTRs) associated with welds on the IHP to verify that it was manufactured in accordance with the 1998 edition, 2000 addenda, of the American Society of Mechanical

Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code Section III, Division 1 – Subsection NF, “Supports.”

The inspectors witnessed welding on lift leg G02b for the RVILR to verify that welding was performed in accordance with the requirements of the ASME B&PV Code. Specifically, the inspectors verified welding was performed under the maximum interpass temperature, the weld area was kept clean and protected from wind and moisture, the welder used proper techniques to achieve acceptable weld quality, surfaces being welded were clean and free of harmful contaminants, and the welding filler metal was properly labeled and traceable to a heat number.

The inspectors performed a walk down of the weld filler metal (rod and wire spool) storage area to verify filler metal was controlled to prevent degradation, inadvertent use, or loss of traceability in accordance with PTI Technical Procedure TP-13.0, “Welding Material Control,” Revision 1, dated April 23, 2013. Additionally, the inspectors verified there were no covered or cored low hydrogen electrodes that required furnaces or special controls to prevent moisture absorption.

The inspectors discussed the special processes program with PTI’s management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors determined that PTI is implementing its manufacturing and special processes programs in accordance with the regulatory requirements of Criterion IX, “Control of Special Processes,” of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the control of special processes program. No findings of significance were identified.

5. Corrective Action

a. Inspection Scope

The inspectors reviewed PTI policies and implementing procedures that govern the Corrective Action Program (CAP) to verify compliance with the requirements of Criterion XVI, “Corrective Action,” of Appendix B to 10 CFR Part 50.

The inspectors reviewed the PTI Corrective Action Report (CAR) Control Log and several CAR’s to ensure that PTI implemented an adequate program to ensure that conditions adverse to quality were promptly identified and corrected. Additionally, the inspectors interviewed PTI personnel. Finally, the inspectors verified that the PTI corrective action process provided a link to the 10 CFR Part 21 program.

The inspectors discussed the CAP with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors concluded that PTI is implementing its corrective program in accordance with the regulatory requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the CAP. No findings of significance were identified.

6. Inspection

a. Inspection Scope

The inspectors reviewed PTI's policies and implementing procedures that govern the inspection program to verify compliance with the regulatory requirements of Criterion X, "Inspection," of Appendix B to 10 CFR Part 50.

The inspectors verified that PTI's procedures for inspection activities provided measures for the generation of inspection documents, such as travelers, instructions, checklists, or other appropriate means. For a sample of inspection documents, the inspectors verified that these documents included the appropriate information as required by PTI procedures such as the inspection date, type of observation, results of examination and tests, and the initials of the QC inspector. The inspectors also verified that mandatory hold points were indicated and that work did not proceed without appropriate approval.

The inspectors witnessed the visual and liquid penetrant examinations of welds 1-5 of VC Summer Unit 2 Lift Leg G02a on WEC drawing APP-V2-004-WM-201-1, Revision 0. The inspectors verified that the examinations were performed by qualified personnel using qualified procedures with calibrated equipment, in accordance with the requirements of PTI Technical Procedures:

- TP-1.0-98EdA00, "Visual Inspections / Tests," Revision 1, dated March 17, 2013
- TP-1.2-98EdA00, "Liquid Penetrant Testing Procedure," Revision 1, dated March 17, 2013

The inspectors discussed the inspection program with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusions

The inspectors determined that PTI is implementing its inspection program to accordance with the regulatory requirements of Criterion X, "Inspection," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the inspection program. No findings of significance were identified.

7. Control of Measuring and Test Equipment (M&TE)

a. Inspection Scope

The inspectors reviewed PTI's policies and implementing procedures that govern the M&TE program to verify compliance with the requirements of Criterion XII, "Control of Measuring and Test Equipment," of Appendix B to 10 CFR Part 50.

The inspectors performed a walk down to ensure that equipment located in the M&TE storage area, M&TE hold area and fabrication shop were labeled, handled, and stored in a manner that indicated the calibration status of the instrument and ensured its traceability to calibration test data. The inspectors observed the use of M&TE associated with material testing (spectrometer, N2 analysis, and tensile strength testing), use of calipers, and a bevel protractor.

For the sample of M&TE observed in the fabrication shop, testing laboratory, and storage lockers, the inspectors determined that the M&TE had the appropriate calibration stickers and current calibration dates, including the calibration due date. The inspectors also verified that the M&TE had been calibrated, adjusted, and maintained at prescribed intervals prior to use. In addition, the calibration records reviewed by the inspectors indicated the as-found or as-left conditions, accuracy required, calibration results, calibration dates, and the due date for recalibration. The inspectors also verified that the selected M&TE was calibrated using procedures traceable to known industry standards. The inspectors reviewed the electronic records for all the M&TE equipment (which included PTI welding machines), to ensure no equipment that was out of calibration was in use, and for M&TE out of calibration, verified a selection of the M&TE was properly marked and segregated. The inspectors verified that for out of calibration (or broken) M&TE, an NCR was written and for the last four completed NCRs (two in 2014 and two in 2015), reviewed the NCR to verify it addressed the acceptability of previous use of the M&TE.

The inspectors discussed the M&TE program with PTI's management, technical staff, and craft personnel. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors determined that PTI is implementing its control of M&TE program in accordance with the regulatory requirements of Criterion XII, "Control of Measuring and Test Equipment," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the control of M&TE. No findings of significance were identified.

8. Oversight of Contracted Activities

a. Inspection Scope

The inspectors reviewed PTI's policies and implementing procedures that govern the implementation of its oversight of contracted activities to verify compliance with the requirements of Criterion IV, "Procurement Document Control," Criterion VII, "Control of Purchased Material, Equipment, and Services," and Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50.

The inspectors reviewed a sample of safety-related POs issued in support of the IHP and the RVILR for the WEC AP1000 reactor design to verify that specific procurement requirements were met and documented correctly. The inspectors verified that the POs included, as applicable, the scope of work, right of access to facilities and records for source inspections and audits, reporting and approving disposition of nonconformance, and references to specific drawings, codes, and specifications. In addition, the inspectors confirmed that all of the safety-related POs reviewed included clauses that invoke the provisions of 10 CFR Part 21 and that required the supplier to conduct safety-related work under its approved QA program.

The inspectors reviewed PTI's approved supplier list (ASL) to ensure that qualified and approved suppliers were listed; that authorized personnel maintained, distributed, and periodically updated the list; and that any revisions to the list were implemented following the applicable procedures. The inspectors verified that the ASL documented (1) the vendor name, (2) the scope of work, (3) the approval date, and (4) the due date. The inspectors also confirmed that the suppliers performing work for PTI were listed on the ASL and that the scope of supply was documented and consistent for the activities contracted.

The inspectors reviewed a sample of external audits. The inspectors confirmed that audit reports contained objective evidence of the review of the relevant QA criteria of Appendix B to 10 CFR Part 50. For audits that resulted in findings, the inspectors verified that PTI initiated adequate corrective actions. In addition, the inspectors reviewed a sample of commercial-grade surveys (CGSs) and annual evaluation reports. The inspectors confirmed that CGSs contained sufficient objective evidence of the

review and verification of relevant critical characteristics of items and services controlled by the supplier and the invoked PO restrictions. The inspectors also verified a sample of CMTRs and Certificates of Conformance for equipment, items and services received associated with the IHP and the RVILR. The inspectors confirmed that the CGSs, audits, and annual evaluations are performed in accordance with the PTI program and regulatory requirements.

The inspectors discussed the oversight of contracted activities and audit programs with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors concluded that PTI is implementing its oversight of contracted activities in accordance with the regulatory requirements of Criterion IV, "Procurement Document Control," Criterion VII, "Control of Purchased Material, Equipment, and Services," and Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the oversight of contracted activities. No findings of significance were identified.

9. Training and Qualification of Personnel

a. Inspection Scope

The inspectors reviewed PTI's policies and implementing procedures that govern the training and qualification program to verify compliance with the requirements of Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50.

The inspectors reviewed the indoctrination, training and qualification of lead auditors and auditors, nondestructive examination personnel, welders, engineering personnel, and Quality Control (QC) personnel to ensure that proficiency was achieved and maintained. The inspectors verified that all personnel performing activities affecting quality had completed the required training and met all the specified requirements in accordance with PTI's policies and procedures.

The inspectors discussed the training and qualification program with PTI's staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors determined that PTI is implementing its control of the personnel training and qualification program in accordance with the regulatory requirements of Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors determined that PTI is implementing its policies and procedures associated with the training and qualification program in accordance with the regulatory requirements of Criterion II of Appendix B to 10 CFR Part 50. No findings of significance were identified.

10. Internal Audits

a. Inspection Scope

The inspectors reviewed PTI policies and implementing procedures that govern the internal audit program to verify compliance with the requirements of Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50.

The inspectors reviewed a sample of internal audits and the qualifications of the PTI and contracted auditors to verify the implementation of the PTI audit program. The inspectors verified that audit teams were comprised of qualified auditors, and that auditors were not auditing their own work. The inspectors also reviewed the disposition of audit findings for adequacy and timeliness. Finally, the inspectors interviewed PTI personnel.

The inspectors discussed the internal audits program with PTI's management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The inspectors concluded that PTI is implementing its internal audit program in accordance with the regulatory requirements of Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the inspectors also determined that PTI is implementing its policies and procedures associated with the internal audits program. No findings of significance were identified.

11. Entrance and Exit Meetings

On April 13, 2015, the inspectors discussed the scope of the inspection with Ms. Shelly Sayer, Chief Executive Officer, Mr. Mike Ryan, Chief Operating Officer, and other members of PTI's management and technical staff. On April 17, 2015, the inspectors presented the inspection results and observations during an exit meeting with Mr. Mike Ryan, and other members of PTI's management and technical staff. The

attachment to this report lists the attendees of the entrance and exit meetings, as well as those individuals whom the inspectors interviewed.

ATTACHMENT

1. ENTRANCE AND EXIT MEETING ATTENDEES

Name	Title	Affiliation	Entrance	Exit	Interviewed
Laura Micewski	Team Leader	NRC/NRO	X	X	
Brent Clarke	Inspector	NRC/NRO	X	X	
Yamir Diaz-Castillo	Inspector	NRC/NRO	X	X	
David Harmon	Inspector	NRCRII	X	X	
Thomas Kendzia	Inspector	NRC/NRO	X	X	
Edgardo Torres	Inspector	NRC/NRO	X	X	
Mike Ryan	Chief Operating Officer	Premier Technology	X	X	
Mathew Burke	Quality Assurance Manager	Premier Technology	X	X	X
Scott Francis	Account Manager	Premier Technology	X	X	
Jennie Cushman	Quality Engineer	Premier Technology	X	X	X
Shelly Sayer	Chief Executive Officer	Premier Technology	X		
Doug Sayer	Chief Business Officer	Premier Technology	X		
Jim Warner	Director, Sales and Marketing	Premier Technology	X	X	
John Mangum	Manufacturing Manager	Premier Technology	X	X	
Jennifer Bregovy	Manufacturing Manager	Premier Technology	X	X	
Ron Bopp	On-site Rep	Westinghouse	X	X	
Diane Herzog	Project Manager	Westinghouse	X	X	
Ron Wessel	Principal Engineer	Westinghouse		X	
Christina Braun	Principal Engineer	Westinghouse		X	
Curtis Shiley		Southern Nuclear	X		
Chris Defnall		Southern Nuclear	X		

Name	Title	Affiliation	Entrance	Exit	Interviewed
Ryan Henderson		Southern Nuclear	X		
Caleb Killian	Welding Engineer/ Quality Control Supervisor	Premier Technology			X
Blaine John	Painter	Premier Technology			X
Eraquio Garza	Painter	Premier Technology			X
Darrin Carter	QA Inspector	Premier Technology			X
Martin Hrabik	Procurement Lead Buyer	Premier Technology			X
Travis Jorgensen	Engineering Manager	Premier Technology			X
Robert Henry	Senior Mechanical Engineer	Premier Technology			X
Taylor Southwick	Dimensional Inspector	Premier Technology			X
Hillary Chavez	Quality Engineer Assistant	Premier Technology			X
Jermaine Newman	Welder	Premier Technology			X

2. INSPECTION PROCEDURES USED

Inspection Procedure (IP) 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated February 13, 2012.

IP 43002, "Routine Inspections of Nuclear Vendors," dated July 15, 2013.

IP 43004, "Inspection of Commercial-Grade Dedication Programs," dated November 29, 2013.

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

None.

4. INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA

The U.S. Nuclear Regulatory Commission (NRC) inspectors identified no inspections, tests, analyses, and acceptance criteria (ITAAC) related to components being fabricated and inspected by Premier Technology, Inc. (hereafter referred to as PTI).

DOCUMENTS REVIEWED

Procedures:

PTI NQA-1 Quality Assurance Manual, 3rd Edition, Revision 3, dated July 29, 2014

PTI Nuclear Quality Assurance Manual, "NPT, NA, and NS Certificates of Authorization and as a Material Supplier in accordance with ASME Section III, Division 1," Edition 1, Revision 5, dated June 30, 2014

American Society of Mechanical Engineers (ASME) Technical Procedure (TP) 2.1, "Qualification and Inspection of Test Personnel," Revision 1, March 17, 2013

PTI Procedure ASME Section III TP 2.6, "Training and Indoctrination," Revision 1, dated April 25, 2013

PTI Procedure ASME Section III TP 7.0, "Unqualified Source Material," Revision 3, dated February 25, 2014

PTI Procedure ASME Section III TP-1.0-98EdA00, "Visual Inspections / Tests," Revision 1, dated March 17, 2013

PTI Procedure ASME Section III TP-1.1-98EdA00, "Magnetic Particle Testing Procedure," Revision 1, dated June 26, 2012

PTI Procedure ASME Section III TP-1.2-98EdA00, "Liquid Penetrant Testing Procedure," Revision 1, dated March 17, 2013

PTI Procedure ASME Section III TP-1.12-98EdA00, "Manual Ultrasonic Examination Procedure," Revision 2, dated 10/19/2010

PTI Procedure ASME Section III TP-1.19-98EdA00, "Radiographic Examination Testing Procedure," Revision 0, dated June 10, 2010

PTI Procedure TP 2.1, "Drawing Preparation and Control," Revision 4, dated March 2, 2015

PTI Procedure TP 2.2, "Engineering Design," Revision 10, dated February 27, 2015

PTI Procedure TP 2.6, "Review of Travelers," Revision 2, dated August 27, 2014

PTI Procedure TP 2.9, "Commercial Grade Item/Service Survey," Revision 0, dated July 10, 2014

PTI Procedure TP 2.14, "Commercial Grade Dedication," Revision 2, dated March 6, 2015

PTI Procedure TP 3.3, "Subcontractor Quality Surveillance," Revision 2, dated March 11, 2015

PTI Procedure TP-4.0, "Shop Coating Application Procedure," Revision 1, dated September 24, 2012

PTI Procedure TP-4.1.6736/6744, "Training and Qualification Personnel for Shop Coating Personnel," Revision 0, dated September 24, 2012

PTI Procedure TP-4.0.6736/6744, "Shop Coating Application Procedure," Revision 3, dated March 11, 2015

PTI Procedure TP 9.1, "Magnetic Particle Yoke Calibration," Revision 0, dated May 24, 2012

PTI Procedure TP 10.1, "Standard Inspection Sampling Plan," Revision 0, dated July 26, 2010

PTI Procedure TP 10.3, "Receiving Inspection," Revision 0, dated March 16, 2010

PTI Procedure TP 11.1, "OES Test Procedure and Work Instruction," Revision 2, dated February 27, 2014

PTI Procedure TP 11.2, "Tensile Test Procedure and Work Instruction," Revision 2, dated March 20, 2014

PTI Procedure TP 11.4, "Nitrogen Test Procedure," Revision 0, dated June 26, 2014

PTI Procedure TP 12.3, "Gage Calibration," Revision 3, dated June 15, 2014

PTI Procedure TP 12.4, "Weld machine Qualification & Calibration Procedure," Revision 1, dated December 13, 2012

PTI Procedure TP-13.0 "Welding Material Control," Revision 1, dated April 24, 2013

PTI Procedure TP-16.1.6744.3, "Cable Bridge Test Procedure AP1000 Integrated Head Package," Revision 0, dated November 12, 2013

PTI Procedure TP-18.2, "Internal Audits," Revision 0, dated July 29, 2014

Welding Procedure PTA-Cp-3I, Revision 3, dated June 28, 2010

Welding Procedure PTN-Cp-1-3, Revision 1, dated March 6, 2013

Welding Procedure PTA-CA-1, Revision 3, dated October 20, 2004

Welding Procedure PTA-B-8U, Revision 4, dated July 13, 2009

Welding Procedure PTA-BH-8a, Revision 4, dated April 17, 2008

WEC Drawings

APP-MV10-V2-105, Integrated Head Package Cable Head Cable Bridge Assembly, Revision 4, dated July 11, 2013

APP-MV10-V2-382, Integrated Head Package Operating Deck Connector Assembly, Revision 2, dated July 25, 2011

APP-MV10-V6-260, Integrated Head Package Lower Shroud Assembly ICI Cable Support, Revision 1, dated October 5, 2010

Corrective Action Reports:

CAR 12-01, "Quality Plan Revision," dated January 3, 2012

CAR 12-06, "3 grinding disks were found in MOX shop area that were not marked as blue for use on stainless steel," dated April 17, 2012

CAR 12-07, "Nonconformance Reporting," dated March 22, 2012

CAR 13-02, "Traveler Major Change Requirement," dated January 30, 2013

CAR 13-26, "Control of Nonconforming Items," dated December 5, 2013

CAR 14-09, "Traveler Requirements," dated April 2, 2014

CAR 14-27, "Vogtle 4 Radial Arm Hoist," dated July 22, 2014

CAR 14-31, "Supplier Corrective Action Request," dated August 19, 2015

CAR 15-06, "Trolley Bracket Stud," dated January 28, 2015

CAR 15-08, "Material procured as ASME Section III (P12-162) material and subsequently transferred for use in NQA-1 (N12-296) Nuclear Safety Related did not have commercial grade dedication performed," dated February 13, 2015

CAR 15-10, "Trolley Bracket Stud for Summer 2, 3 & Vogtle 3, 4," dated February 4, 2015

Nonconformance Reports

NCR 11-454, "2-1/2" x 2-1/2" x 1/4" Angle," dated March 24, 2010

NCR 12-194, "2-1/2" x 84" x 120" Plate," dated May 2, 2012

NCR 13-251, "V3-Lower Shroud DSR record discrepancies," dated June 26, 2013

NCR 13-438, "Unistrut failed material testing," Revision 1, dated February 18, 2015

NCR 14-082, "Used wrong material," Revision 1, dated February 19, 2014

NCR 14-105, "Threads on screw pad damaged," dated February 14, 2014

NCR 14-196, "Thickness for upper shroud lower flange (Summer 2) too thick," dated April 4, 2014

NCR 14-197, "Thickness for upper shroud lower flange (Vogtle 3) too thick," dated April 4, 2014

NCR 14-256, "Romer PTI-597," dated May 13, 2014

NCR 14-335, "Tapped hole for mounting bridge winch incorrect," dated September 3, 2014

NCR 14-371, "Outer diameter for 1 inch round bar failed to meet tolerance," dated July 22, 2014

NCR 14-394, "During use calipers were damaged by production for a non-final dimensional verification on the ID side resulting in the calipers to be off by .009" dated August 7, 2014

NCR 14-396, "PTI neglected to provide the lowest service temperature in the procurement documents which resulted in materials being received without Charpy Impact Test being performed," dated August 7, 2014

NCR 14-561, "Carboline Carboguard paint received greater than 3 months old," dated December 19, 2014

NCR 15-005, "Bevel weld incorrect," dated January 5, 2015

NCR 15-006, "During use an internal sliding component of the calipers became dislodged and the caliper is not able to close," dated January 6, 2015

NCR 15-087, "Load Cell was sent out for annual calibration and was found out of tolerance," dated February 19, 2015

NCR 15-145, "Tripod Spreader dimensional requirements not met," dated March 25, 2015

NCR 15-165, "Penetrant inspection failure," dated April 3, 2015

NCR 15-173, "Approved Supplier List," dated April 13, 2015

NCR 15-176, "QA-7.1, Control of Purchased Items and Services," dated April 16, 2015

CARs/NCRs generated during inspection

CAR 15-02, "Calibration Log was not updated to reflect current status of out of service," dated April 15, 2015

CAR 15-04, "Measuring & Test Equipment in paint shop," dated April 15, 2015

CAR 15-15, "Approved Supplier List," dated April 15, 2015

CAR 15-16, "Quality Plating Co., Inc. is a commercial supplier and cannot qualify their procedure for 10CFR50 Appendix B work," dated April 15, 2015

CAR 15-17, "VT Procedure did not state the special illumination, instruments or equipment to be used," dated April 15, 2015

CAR 15-18, "Calibration Supplier," dated April 16, 2015

CAR 15-19, "FARO Certificate of Calibration not ISO 17025," Revision 1, dated April 16, 2015

CAR 15-20, "Environmental readings shall be taken at intervals not to exceed every two hours," dated April 16, 2015

CAR 15-21, "NCR and CAR forms contain information for trending that was not adequately utilized," April 16, 2015

CAR 15-22, "Justification of Sampling Plans," dated April 16, 2015

NCR 15-170, "Contrary to requirement weld procedure PTA-B-8U was utilized for welding and acceptance," dated April 13, 2015

NCR 15-171, "Contrary to requirement weld procedure PTA-B-8U was utilized for welding and acceptance," dated April 13, 2015

Purchase Orders:

PO 87030, Purchase Order to Dubose National Energy Services for machining services, Revision 1, dated December 10, 2009

PO 92342, Purchase Order to Reliance Metalcenter for safety-related materials, Revision 5, dated June 30, 2010

PO 92705, Purchase Order to Energy & Process for safety related materials, Revision 2, dated July 21, 2010

PO 93394, Purchase Order to TW Metals for safety-related materials, Revision 2, dated August 19, 2010

PO 93693, Purchase Order to IMR KHA Test Laboratories for laboratory services, Revision 5, dated September 2, 2010

PO 95648, Purchase Order to Electrical Wholesale for laboratory services, Revision 1, dated November 29, 2010

PO 96767, Purchase Order to Edgen Murray Corporation for safety related materials, dated January 18, 2011

PO 97539, Purchase Order to Nova Machine Products COR for safety-related Pan Head Screws, Cap Screws, Threaded Rod, Hex Bolts, Structural Bolts, Jam Nuts, Washers, dated February 23, 2011

PO 98905, Purchase Order to IMR KHA Test Laboratory for laboratory services, dated April 27, 2011

PO 101825, Purchase Order to IMR Portland for laboratory services, Revision 1, dated October 31, 2011

PO 102327, Purchase Order to Hatfield Manufacturing for machining services, dated December 5, 2011

PO 102951, Purchase Order to Metallix Technologies Inc for safety-related materials, dated January 19, 2012

PO 103841, Purchase Order to Airgas for safety-related materials, dated April 5, 2012

PO 104212, Purchase Order to Element Huntington Beach for laboratory services, dated May 7, 2012

PO 104503, Purchase Order to Electrical Wholesale for laboratory testing, dated May 30, 2012

PO 104712, to IMR KHA Portland for chemical and testing services, dated June 6, 2012

PO 104717, Purchase Order to IMR Portland for laboratory services, Revision 2, dated June 12, 2012

PO 106589, to Electrical Wholesale for Unistrut Slotted Channels, dated October 25, 2012

PO 106457, Purchase Order to Bonneville Machine for machining services, Revision 4, dated October 15, 2012

PO 113507, to Axion Technical Services, for internal audit, dated May 2, 2014

PO 113758, Purchase Order to Ryerson & Son for commercial materials, Revision 1, dated May 27, 2014

PO 114943, Purchase Order to Dubose National Energy Services INC for safety-related materials, dated September 11, 2014

PO 115008, to FARO for calibration services, dated September 19, 2014

PO 115632, Purchase Order to Carboline Company for safety related materials, Revision 1, dated November 24, 2014

POs 11700 and 117001, to Western States Calibration for calibration services, Revision 0, dated April 8, 2015

Other documents:

Approved Supplier List, dated February 23, 2015

Hold Tags for NCR 15-165," dated April 3, 2015

10 CFR Part 21 Evaluation for 21-13-01, dated April 19, 2013

10 CFR Part 21 Evaluation for 21-14-01, dated March 7, 2014

10 CFR Part 21 Evaluation for 21-14-02, dated August 14, 2014

10 CFR Part 21 Evaluation for 21-14-03, dated October 6, 2014

10 CFR Part 21 Evaluation for 21-14-04, dated December 29, 2014

10 CFR Part 21 Evaluation for 21-15-01, dated February 12, 2015

10 CFR Part 21 Evaluation for 21-15-02, dated April 13, 2015

Premier Technology, Inc. QA Annual Report for 2014, dated February 16, 2015

Premier Technology, Inc. QA Annual Report for 2013, dated February 6, 2014

ASTM D5144, "Use of Protective Coating Standards in Nuclear Power Plants," Revision 8, dated November 15, 2008

AP1000 Design Specification APP-G1-SX-001, "AP1000 Painting of Shop Fabricated Steel," Revision 6, dated June 18, 2012

AP1000 APP-GW-Z0-610, "Supplementary Manufacturing Information," Revision 0, dated September 25, 2006

AP1000 APP-MV10-Z0-201, "AP1000 Integrated Head Package Fabrication Specification," Revision 5

Response to Request for Information #4500630612/4500630606-001 from Premier Technology to Westinghouse Electric Company, "Chrome Plating Requirements," dated May 14, 2015

Calibration Records

Calibration records for: PTI-404 Mag Yoke Light, PTI-404 Mag Yoke, PTI-610 Bevel Protractor, PTI-612 Digital pressure Gauge, PTI-681 Infrared Thermometer, PTI-774 Digital Caliper, PTI-789 Radius Gauge, PTI-849 Free Path Test Gauge, PTI-1030 1.00 inch radius gauge, PTI-1072 Instron Tensile Test Machine, PTI-1074 Reaker OES Spectrometer, PTI-1075 Digital Multimeter, PTI-1085 Load Cell, PTI-1152 Leco N2 Analyzer

Certificate of Calibration, Instron Calibration Laboratory for Satec Serial 600DXS3200, dated January 15, 2014

Commercial-Grade Dedication Documents

Commercial Grade Dedication Report Logs for AP1000 Integrated Head Package and Internal Lifting Devise

Certificate of Conformance (CoC) from IMR to PTI for PO No. 103835 for a 4" x 7" round bar, Heat No. A105097, dated April 24, 2012

CoC from IMR to PTI for PO No. 102637 for a 3/8" x 4" x 10" Plate, dated January 17, 2012

CoC from IMR to PTI for PO No. 102610, Revision 1, for a 2-1/2" x 4" x 12" Long Plate Coupon, dated January 17, 2012

CoC from IMR to PTI for PO No. 102610, Revision 1, for a 2-1/2" x 2-1/2" x 1/4" @ 12" Angle, dated January 17, 2012

CoC from IMR to PTI for PO No. 101825 for a 2-1/2" x 2-1/2" x 1/4" @ 10" Angle, dated November 15, 2011

Certificate of Compliance for PO No. 97211, for a WT 6 x 32.5 x 120", dated February 18, 2011

Certified Material Test Report (CMTR) from PTI for a 4" x 20', A-588 Grade A, Heat Number AA105097, dated May 3, 2012

CMTR from PTI for a 3/8" x 48" x 48" Plate, SA-572-50, Heat Number B0L554, dated February 24, 2012

CMTR from PTI for a 2-1/2" x 2-1/2" x 1/4" x 20' Angle, SA-36, Heat No. PL1110466901, dated May 3, 2012

CMTR from PTI for a WT6 x 32.5 x 120", SA-36, Heat Number A053808, dated July 22, 2011

Commercial Grade Dedication (CGD) No. 10-44 of Flexicraft Industries, dated August 16, 2010

Commercial Grade Dedication (CGD) No.15-040, Job # 006736/006744, revision 0, dated April 13, 2015

CGD No. 10-98 of Flexicraft Industries, dated August 23, 2010

CGD No. 11-53 of Electrical Wholesale Supply Co., dated June 10, 2011

CGD No. 12-022 of ASTM A992 structural shapes, dated June 6, 2012

CGD No. 12-021 of ASTM A276, TP 304, HR, COND A bars and structural shapes, dated August 17, 2012

CGD No. 13-001 of Electrical Wholesale Supply Co., dated February 11, 2013

CGD No. 13-062 of FARO Technologies, Inc., dated October 15, 2014

CGD No. 14-008 of Futek Advance Sensor Technology, dated February 20, 2014

CGD No. 14-012 of ASTM A240 Plate, dated April 15, 2014

CGD No. 14-013 of Ryerson, Revision 1, dated August 11, 2014

CGD No. 14-023 of Marmon Keystone, dated August 23, 2014

CGD No. 14-035 of Quality Plating Co. Inc, Revision 1, dated May 16, 2014

CGD No. 14-049 of Brammer Standard Company, dated May 28, 2014

CGD No. 14-047 of Hexagon Metrology Inc., dated June 25, 2014

CGD No. 14-079 of Howden Alpha Ventilation Systems, Revision 1, dated September 5, 2014

CGD No. 14-088 of Ryerson, Revision 1, dated November 4, 2014

CGD No. 14-093 of Instron Calibration Laboratory, dated November 11, 2014

Commercial Grade Survey (CGS) No. S14-004 of Quality Plating, dated March 6, 2014

CGS No. S11-05 of Hatfield Manufacturing, dated December 12, 2011

CGS No. S14-005 of Ryerson, dated December April 8, 2014

Supplier Audit Records

Audit Report No. 17048 of Western States Calibration, dated February 27, 2012

Annual Evaluation of Western States Calibration, dated December 2, 2014

Audit Report No. 11-026 of Reliance Metal Center, dated August 8, 2011

Annual Evaluation of Reliance Metal Center, dated December 30, 2013

Audit Report No. 17012 of Dubose National Energy Service, dated July 23, 2012

Annual Evaluation of Dubose National Energy Service, dated December 1, 2014

Annual Evaluation of Hatfield Manufacturing, dated November 29, 2012

Audit Report No. 17028 of Nova Machine Products Inc., dated June 15, 2012

Annual Evaluation of Nova Machine Products, dated December 4, 2014

Audit Report No. 11-004 of Lincoln Structural Solutions, dated October 31, 2014

Annual Evaluation of Lincoln Structural Solutions, dated December 2, 2014

Audit Report No. 18059 of IMR KHA, dated June 11, 2013

Annual Evaluation of IMR KHA, dated December 1, 2014

Audit Report No. 1204 of Energy and Process Corporation, dated January 24, 2013

Annual Evaluation of Energy and Process Corporation, dated December 1, 2014

Audit Report No. 14-002 of Element Huntington Beach, dated September 26, 2014

Annual Evaluation of Element Huntington Beach, dated December 4, 2014

Audit Report No. 2014-E02 of Airgas, Inc., dated February 22, 2014

Annual Evaluation of Airgas, Inc., dated December 1, 2014

Audit Report No. 19105 of TW Metals Nuclear Materials Solution, dated April 17, 2014

Annual Evaluation of TW Metals Nuclear Materials Solution, dated December 3, 2014

Audit Report No. 12-003 of Metallix Technologies, Inc., dated May 11, 2012

Internal Audits

Audit Plan for Audit 14-001, Revision 1, dated July 8, 2014

Audit Report for Audit 14-001, dated May 22, 2014

Addendum to Internal Audit 14-001, dated May 3, 2014

Response to Internal Audit 14-001, dated May 3, 2014

Audit Plan for Audit 13-001, dated April 20, 2013

Audit Report for Audit 13-001, dated May 4, 2013

NIAC Audit Checklist Summary Sheet, dated July 8, 2014

Internal Audit Checklist for Audit 2012-01, dated May 20, 2012

Internal Audit Checklist for Audit 2013-01, dated May 4, 2013

Internal Audit Checklist for Audit 2014-01, dated May 3, 2014

Training and Qualification Records

P. Barker, AWS CWI 08100081 dated October 2008, & level II PT, dated October 2, 2014

J. Briggs, AWS CWI 05080321 dated August 2005, & Level II MT, dated October 1, 2014

M. Burke, Lead Auditor, dated December 16, 2013

D. Carter, Quality Assurance Inspector, Level II Coatings Inspector, dated January 3, 2013

T. Davis ID 100, Welder, dated July 17, 2009

E. Garza, Painter, dated April 19, 2012

B. John, Painter, dated April 19, 2012

C. Killian, AWS CWI 808090063 dated August 2008, & level II MT, dated October 1, 2014

C. Labra, Painter, dated April 19, 2012

G. Lara ID 61, Welder, dated January 15, 2013

R. McClellan, Lead Auditor, dated December 12, 2008

F. Perez, Painter, dated April 19, 2012

J. Ponciono ID 171, Welder, dated November 12, 2012

J. Solasky, Lead Auditor, dated April 4, 2012

H. Watson, AWS CWI 01030061 dated March 2001, & Level II MT, dated June 20, 2014